

FILED

JUN 2 2025

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1 NIMA GHARAVI  
2 4610 North Clark St. #1098  
3 Chicago, IL 60640  
4 +1 (773) 899-4688  
5 dmca@midwestwrestle.com

6 Requestor *Pro Se*

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11  
12 CV-25 80138-MISC.

13 Case No.:

14 IN RE DMCA SECTION 512(h)  
15 SUBPOENA TO DYNADOT INC.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

13  
14 REQUEST TO THE CLERK FOR  
15 ISSUANCE OF SUBPOENA PURSUANT  
16 TO 17 U.S.C. § 512(h) TO IDENTIFY  
17 ALLEGED COPYRIGHT INFRINGER(S)  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SK

1 Requestor Nima Gharavi (“Requestor”) respectfully requests that the Clerk of this Court  
2 issue a subpoena pursuant to 17 U.S.C. § 512(h) to Dynadot Inc. (“Service Provider”) for  
3 the purpose of identifying one or more alleged infringers of Requestor’s copyright(s). In  
4 support of this Request, Requestor states as follows:  
5

- 6 1. **Requestor’s Copyright Ownership:** Requestor Nima Gharavi is the exclusive  
7 owner of the copyright(s) in the motion picture(s) (“the Work”) allegedly  
8 infringed.  
9
- 10 2. **Alleged Infringement:** Requestor has discovered that one or more individuals  
11 using Service Provider’s platform have allegedly infringed Requestor’s exclusive  
12 rights, including but not limited to, the right to reproduce pursuant to 17 U.S.C. §  
13 106(1), by publishing one or more unauthorized reproductions copied from the  
14 Work to which Requestor retains exclusive copyright(s).  
15
- 16 3. **Notification Sent:** Requestor sent one or more notifications in compliance with 17  
17 U.S.C. § 512(c)(3)(A), requesting the removal of the infringing material, attached  
18 as Exhibit 1.  
19
- 20 4. **Purpose of Subpoena:** The purpose of this subpoena is to obtain information  
21 sufficient to identify the alleged infringers. *See In re DMCA Subpoena to eBay,*  
22 *Inc.*, No. 15-CV-922-BEN-MDD, 2015 WL 3555270, at \*4 (S.D. Cal. June 5,  
23 2015) (holding a DMCA subpoena issued on April 2, 2015, valid and enforceable  
24 for production of "the name, last known address, last known telephone number,  
25  
26  
27  
28

any electronic mail addresses associated with each account from January 1, 2012, to the date of the subpoena and any logs of Internet Protocol addresses used to access the subject accounts" during the same period).

**5. Compliance with Statutory Requirements:** Pursuant to 17 U.S.C. § 512(h)(2), Requestor has submitted:

- A copy of the notification(s) sent (Exhibit 1);
- A proposed subpoena (Exhibit 2); and
- A sworn declaration confirming that the subpoena is sought solely for the purpose of protecting Requestor's rights under Title 17 (Exhibit 3).

**Clerk's Duty to Issue Subpoena:** Under 17 U.S.C. § 512(h)(4), if the notification satisfies the requirements of Section 512(c)(3)(A), and the proposed subpoena and declaration are in proper form, the Clerk of Court shall expeditiously issue and sign the subpoena.

Dated: May 29, 2025



Nima Gharavi

*Requestor Pro Se*

# Exhibit 1

DMCA Takedown Notification #1

**From:** Nima Gharavi  
**Sent:** Monday, August 21, 2023 5:47 PM  
**To:** official@mypornvid.fun  
**Subject:** DMCA

Hello,

I am writing to request takedown of all videos taken from my YouTube channel, Midwest Wrestle — <https://www.youtube.com/channel/UCOTWc6iY4Ms8xZjVTg7VPow/>

The following are just a small sample of videos from my channel that appear on your website:

1.

My original copyrighted work: <https://www.youtube.com/watch?v=Jod0QGJPU9g>  
MyPornVid.fun copy 1: <https://mypornvid.fun/videos/5/Jod0QGJPU9g/teen-wrestling/117-%E2%80%93-maddox-mcarther-of-empire-gold-over-ethan-olson-of-illinois-cornstars-by-dec-7%E2%80%93>  
MyPornVid.fun copy 2: <https://mypornvid.fun/videos/3/Jod0QGJPU9g/teen-wrestling/117-%E2%80%93-ethan-olson-123g125-of-illinois-cornstars-vs-maddox-mcarthur-123r125-of-empire-gold>

2.

My original copyrighted work: <https://www.youtube.com/watch?v=H53amT-UJmg>  
MyPornVid.fun copy: <https://mypornvid.fun/videos/17/H53amT-UJmg/teen-wrestling/120-3a-%E2%80%93-trevor-silzer-123g125-of-tinley-park-andrew-il-vs-dominic-marre-123r125-of-glenbard-north-il>

3.

My original copyrighted work: <https://www.youtube.com/watch?v=wWBs8dSzkFc>  
MyPornVid.fun copy: <https://mypornvid.fun/videos/18/wWBs8dSzkFc/teen-wrestling/138-%E2%80%93-tyler-nelson-123g125-of-morris-fitness-ga-vs-keegan-roberston-123r125-of-illinois-cornstars>

4.

My original copyrighted work: <https://www.youtube.com/watch?v=mycngZHHq2s>  
MyPornVid.fun copy: <https://mypornvid.fun/videos/27/mycngZHHq2s/teen-wrestling/97-girls-freestyle-%E2%80%93-katey-valdez-123b125-of-colorado-vs-alexandra-sebek-123r125-of-illinois>

Please disable scraping of my channel for all videos, and take down the videos listed at the links above.

As requested on your DMCA page, “at least one search term under which the link appears in MyPornVid.fun’ search results”, a search for “midwest wrestle” on MyPornVid.fun results in numerous videos taken from my YouTube channel linked at the top of this email.

This notification is in compliance with 17 U.S.C. 512 and the Digital Millennium Copyright Act ("DMCA"). As the original creator and copyright owner, I swear under penalty of perjury that it is accurate, and that I, the complaining party am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed, and that I have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner.

Sincerely,  
Nima Gharavi  
Midwest Wrestle

# Exhibit 2

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

## UNITED STATES DISTRICT COURT

for the

Northern District of California

In re DMCA 512(h) Subpoena to Dynadot Inc.

*Plaintiff*

v.

*Defendant*

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Dynadot Inc.

205 E 3rd Ave #314, San Mateo, CA 94401, United States

*(Name of person to whom this subpoena is directed)*

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment A

Place: Nima Gharavi  
4610 North Clark St. #1098  
Chicago, IL 60640

Date and Time:

06/30/2025 1:45 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk**Attorney's signature*The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Plaintiff

Nima Gharavi, who issues or requests this subpoena, are:

Pro Se, 4610 North Clark St. #1098, Chicago, IL 60640, +1 (773) 899-4688, dmca@midwestwrestle.com

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).



**ATTACHMENT A TO SUBPOENA TO DYNADOT INC.**

**SCHEDULE OF DOCUMENTS TO BE PRODUCED**

For each of the subsequently listed Dynadot Inc. domain name(s): the name, last known address, last known telephone number, any electronic mail addresses associated with each account from three (3) years to the date of the subpoena and any logs of Internet Protocol addresses used to access the subject account(s) from three (3) years to the date of the subpoena. *See In re DMCA Subpoena to eBay, Inc.*, No. 15CV922-BEN-MDD, 2015 WL 3555270, at \*4 (S.D. Cal. June 5, 2015) (holding a DMCA subpoena issued on April 2, 2015, valid and enforceable for production of "the name, last known address, last known telephone number, any electronic mail addresses associated with each account from January 1, 2012, to the date of the subpoena and any logs of Internet Protocol addresses used to access the subject accounts" during the same period).

**DOMAIN NAME(S)**

**1. MyPornVid.Fun**

- a. <https://www.dynadot.com/domain/whois?domain=MyPornVid.Fun>

# Exhibit 3

1 NIMA GHARAVI  
2 4610 North Clark St. #1098  
3 Chicago, IL 60640  
4 +1 (773) 899-4688  
5 dmca@midwestwrestle.com

6 Requestor *Pro Se*

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11  
12  
13  
14 IN RE DMCA SECTION 512(h)  
15 SUBPOENA TO DYNADOT INC.  
16  
17  
18

Case No.:

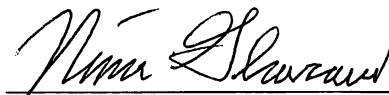
DECLARATION IN SUPPORT OF  
SUBPOENA TO OBTAIN THE  
IDENTITY OF ONE OR MORE  
ALLEGED INFRINGERS PURSUANT  
TO 17 U.S.C. § 512(h)

1 I, Nima Gharavi, declare under penalty of perjury that the following is true and correct:

- 2 1. **Purpose:** I am the original creator and exclusive owner of all copyrights in all  
3 motion pictures published to the YouTube channel  
4 “https://www.youtube.com/MidwestWrestle” (collectively “the Work”) protected  
5 under U.S. copyright law. I have reason to believe that one or more individuals  
6 have infringed my copyright(s) in the Work by publishing one or more  
7 unauthorized reproductions copied from the Work.  
8  
9  
10  
11 2. **DMCA Notice:** I sent one or more DMCA takedown notices (“Exhibit 1”)  
12 pursuant to 17 U.S.C. Section 512(c)(3)(A) regarding the alleged infringement.  
13  
14 3. **Request for Subpoena:** I am requesting the issuance of a subpoena pursuant to 17  
15 U.S.C. § 512(h) to identify the alleged infringer(s). The information sought  
16 through this subpoena will be used solely for the purpose of protecting my rights  
17 under Title 17.  
18  
19  
20 4. **Good Faith Belief:** I have a good faith belief that the use of the material in the  
21 manner complained of is not authorized by me, my agent, or the law.  
22  
23  
24  
25  
26  
27  
28

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.  
3  
4

5 Executed on May 29, 2025 at Chicago, Illinois.  
6  
7



8 Nima Gharavi

9 Requestor *Pro Se*  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28